

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

ALICIA STREET, RONALD HARRIS,)	
FUDAIL MCCAIN, ASHLEY THEIS, and)	
NICOLE WARRINGTON, on behalf of)	
Themselves and a class of similarly)	
situated persons,)	
)	Cause No. 4:19-cv-02590-CDP
Plaintiffs,)	
)	
v.)	
)	
LT. COL. LAWRENCE O'TOOLE, et.al.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR ATTORNEY'S FEES AND COSTS

Plaintiffs hereby move this Court to grant Plaintiffs' Counsel's Motion for Attorney's Fees and Costs. In support thereof, Plaintiffs state as follows:

1. The Settlement Agreement in this case states that Plaintiffs' counsel may recover up to one third of the total amount of the Settlement Fund. Such an amount is consistent with similar settlements in complex class action cases in this District and in the Eighth Circuit more broadly.
2. This suit was filed more than three years ago, and the case has involved extensive litigation, discovery, and appellate work.
3. The parties reached a settlement only after years of hard-fought litigation and one failed mediation.
4. In addition to the attorney's fees, Plaintiffs' counsel requests \$201,910.37 in reimbursed costs, mainly involving discovery expenditures and expert costs. Plaintiffs' counsel paid for these costs without any promise of reimbursement in this litigation. The reimbursements requested are also similar to those commonly reimbursed in this district.

For the foregoing reasons and those discussed in Plaintiffs' supporting memorandum, Plaintiffs request this Court grant their motion for costs and fees.

Dated: February 20, 2023

Respectfully submitted,

KHAZAELI WYRSCH LLC

/s/ James Wyrsh

Javad M. Khazaeli, 53735MO

James R. Wyrsh, 53197MO

John M. Waldron, 70401MO

911 Washington Avenue, Suite 211

St. Louis, MO 63101

(314) 288-0777

(314) 400-7701 (fax)

javad.khazaeli@kwlawstl.com

james.wyrsh@kwlawstl.com

jack.waldron@kwlawstl.com

CAMPBELL LAW LLC

Alicia Campbell, 59586MO

8112 Maryland Ave.

Suite 400

St. Louis, Missouri 63105

alicia@campbelllawllc.com

Attorneys for Plaintiffs